


UNITED STATES DISTRICT COURT
FOR THE DISTRICT COURT OF MASSACHUSETTS

Ina Steiner,
David Steiner,
Steiner Associates, LLC,
(Publisher of EcommerceBytes)
Plaintiffs

vs.

eBay, Inc., et al.,
Defendants

CASE NO: 1:21-cv-11181-

**MOTION FOR LIMITED DISCOVERY AND INCORPORATED
MEMORANDUM OF LAW, AND FOR AN EXTENSION OF THE DEADLINE TO
FILE AN AMENDED COMPLAINT**

Now come the Plaintiffs and respectfully request that this Court permit the Plaintiffs to obtain limited discovery before amending the Complaint.

This Court has granted Plaintiffs leave to file an amended Complaint by February 15, 2023. (Woodlock, J.). As noted in the Court's Order, voluminous information has come to light in the parallel criminal cases, which has cast light on further discovery that would aid in amending Plaintiffs' complaint, and conduct the "careful reconsideration for purposes of specific reframing" the claims in Plaintiffs' original complaint. In order to conserve the resources of the Court and the parties, Plaintiffs seek additional, limited discovery at this juncture, in order to amend the Complaint and prevent the need to request further amendment in the future, to either additional claims or parties.¹

¹ In lodging the request for discovery, Plaintiffs are in no way conceding that any of the claims in its original complaint fail to satisfy the well-pleaded complaint standard. *See* Fed. R. Civ. P. 8; *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007). In the January 4, 2023

2/14/23

DENIED,

